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*Co-Lead/Liaison Counsel for Plaintiffs*

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

**IN RE: BARD IVC FILTERS  
PRODUCTS LIABILITY  
LITIGATION**

No. MD-15-02641-PHX-DGC

**PLAINTIFFS' UNOPPOSED  
MOTION FOR LEAVE TO FILE  
UNDER SEAL PLAINTIFFS'  
SUBMISSION OF CASES FOR  
BELLWETHER GROUP 1 AND  
PLAINTIFFS' RESPONSE TO  
DEFENDANTS' SUBMISSION OF  
CASES FOR BELLWETHER  
GROUP 1**

Plaintiffs move this Court for an Order pursuant to the Stipulated Protective Order (Doc. 268), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6, sealing (1) Plaintiffs' Submission of Cases for Bellwether Group 1 ("Submission") and (2) Plaintiffs' Response to Defendants' Submission of Cases for Bellwether Group 1 ("Response"). In accordance with CMOs 11 and 18, Plaintiffs submitted to the Court their Submission to the Court "outside the ECF system." The Court has requested that the parties file their submissions and responsive submissions. Plaintiffs' Submission and Response contain information that constitutes trade secrets or other confidential research, development, or commercial information and has been designated by Bard as such pursuant to the Stipulated Protective Order as well as confidential, personal health information of individuals, thereby warranting protection from public disclosure.

1 For the foregoing reasons, and so that Plaintiffs can file their Submission and  
2 Response as part of the record in this case while complying with the terms of various  
3 protective orders, Plaintiffs request that the Court grant Plaintiffs' leave to file their  
4 Submission and their Response under seal.

5 Plaintiffs have conferred with Defendants regarding this motion and Defendants do  
6 not oppose this motion. Defendants reserve their right to challenge the confidentiality  
7 designations of the sealed documents at a later time pursuant to the terms in the Stipulated  
8 Protective Order

9 RESPECTFULLY SUBMITTED this 28<sup>th</sup> day of April 2017.

10 GALLAGHER & KENNEDY, P.A.

11 By: s/ Paul L. Stoller  
12 Mark S. O'Connor  
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18  
19  
20 **CERTIFICATE OF SERVICE**

21  
22 I hereby certify that on this 28<sup>th</sup> day of April, 2017, I electronically transmitted the  
23 attached document to the Clerk's Office using the CM/ECF System for filing and  
24 transmittal of a Notice of Electronic Filing.

25  
26 s/ Deborah Yanazzo  
27  
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